



ONS-Telecom, LLC

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February 22, 2011
Via FedEx Overnight to
9300 East Hampton Drive
Capitol Heights, MD 20743

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Re: ONS-Telecom, LLC
FCC Annual 47 CFR / 64.2009(e) CPNI Certification
EB Docket 06-36
Certification for 2011 Covering Prior Calendar Year 2010

Dear Ms. Dortch,

Enclosed please find (1) original and (4) copies of ONS-Telecom's FCC Annual 47 CFR / 64.2009(e) CPNI Certification for 2011 covering prior calendar year 2010.

Under separate mailing we have sent (1) copy to Best Copy and Printing per the filing instructions.

We would appreciate it if you would please acknowledge receipt of this filing by date stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for that purpose.

Questions regarding this filing should be directed to my attention at 941-358-8195.

Sincerely,

Linda Smith
Secretary

Cc: Best Copy and Printing

Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for *[Insert year]* covering the prior calendar year *[Insert year]*

1. Date filed: *[February 22, 2011]*
2. Name of company(s) covered by this certification: *[ONS-Telecom, LLC]*
3. Form 499 Filer ID: *[822898]*
4. Name of signatory: *[Linda Smith]*
5. Title of signatory: *[Secretary]*
6. Certification:

I, *[Linda Smith]*, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company *[has not]* taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. [NOTE: If you reply in the affirmative, provide an explanation of any actions taken against data brokers.]

The company *[has not]* received customer complaints in the past year concerning the unauthorized release of CPNI [NOTE: If you reply in the affirmative, provide a summary of such complaints. This summary must include the number of complaints, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.]

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed *Linda Smith* [Signature of an officer, as agent of the carrier]

Attachments: Accompanying Statement explaining CPNI procedures
 Explanation of actions taken against data brokers (if applicable)
 Summary of customer complaints (if applicable)

47 C.F.R. § 64.2009 Safeguards required for use of customer proprietary network information.

- (a) Telecommunications carriers must implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.
- (b) Telecommunications carriers must train their personnel as to when they are and are not authorized to use CPNI, and carriers must have an express disciplinary process in place.
- (c) All carriers shall maintain a record, electronically or in some other manner, of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI. All carriers shall maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Carriers shall retain the record for a minimum of one year.
- (d) Telecommunications carriers must establish a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and maintain records of carrier compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.
- (e) A telecommunications carrier must have an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis. The officer must state in the certification that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certificate explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart. In addition, the carrier must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. This filing must be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year.
- (f) Carriers must provide written notice within five business days to the Commission of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.
 - (1) The notice shall be in the form of a letter, and shall include the carrier's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.
 - (2) Such notice must be submitted even if the carrier offers other methods by which consumers may opt-out.

ONS-Telecom, LLC
Statement of CPNI Procedures and Compliance
Certification for 2011 Covering Prior Year 2010
EB Docket 06-36

ONS-Telecom, LLC does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Our marketing efforts do not require the use of any client-specific information. Should we elect to use CPNI in any future marketing efforts, we will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

We have in place specific processes to safeguard our customers' CPNI from improper use or disclosure by its employees and attempts by third parties to gain unauthorized access to CPNI and call detail information. Customers are contacted at the telephone number of record or email address of record to follow up on information or service inquiries. ONS-Telecom has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI.

We do not provide call detail information over the telephone. All customer service personnel are trained not to discuss call detail information unless calling party can identify the call detail related to their inquiry. Customers (inbound callers into our Customer Service Center) are required to give the call detail information to the Customer Service Representatives as well as their names prior to providing any assistance or information. We only disclose the information requested that comes directly from the billed information. The customer must have the call detail/bill when calling and must be the name on the account.

To date, ONS-Telecom has never disclosed any CPNI to a third party, but should this occur, records will be maintained in accordance with FCC rules.

We have instituted authentication procedures to safeguard the disclosure of CPNI on-line which do not require the use of readily available biographical information or account information as defined by the FCC. We authenticate customers by providing a unique system generated user ID and password. Customer on-line access is restricted to one user using the service initiation e-mail address of record for communications purposes. ONS-Telecom has established a back up authentication method for lost or stolen passwords that does not involve readily available biographical information or account information. If a password is lost or forgotten, a system generated new User ID and password is sent electronically to the customer e-mail address of record. Unless the appropriate password is provided, we do not allow on-line access to the client's data.

We have procedures in place to notify customers whenever a password, authentication for lost or forgotten passwords, online account, or address of record is created or changed without revealing the changed information. We do not send the notification to the new account information. A voicemail is left with the phone number of record.

We do not have any retail locations and therefore do not disclose CPNI in-store.

We have not had any attempts by third parties to gain unauthorized access to client information and therefore have no records to date of such breaches. However, we have procedures in place to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

We have not taken any actions against data brokers in the last year.

We have not received any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2010.

We have not developed any information with respect to the processes pretexters may use to attempt to access CPNI.